

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AMERICAN FAMILY HOME INSURANCE  
COMPANY, as Subrogee of Adrian Biesecker,

Plaintiff,

v.

MCLAREN AUTOMOTIVE, INC., and  
KRAUSE FAMILY MOTORCARS, LLC,

Defendants.

Docket No. 2:21-cv-04016-JDW

**DECLARATION OF CLINTON J. McCORD IN SUPPORT OF PLAINTIFF'S  
SUPPLEMENTAL BRIEF IN OPPOSITION TO MOTION TO DISMISS OF  
DEFENDANT KRAUSE FAMILY MOTORCARS, LLC**

I, Clinton J. McCord, do hereby declare as follows:

1. I am counsel of record for Plaintiff, American Family Home Insurance Company as subrogee of Adrian Biesecker. I have personal knowledge of the facts stated herein.

2. Attached hereto as **Exhibit 1** (first page) is a true and correct copy of a document (sales summary) that was produced by Defendant Krause Family Motorcars, LLC ("Krause") on January 21, 2022. My office added the document label/number "KRAUSE\_0001" for ease of reference. The remainder of Exhibit 1 is a true and correct copy of an e-mail exchange between me and Krause's counsel. My office added the yellow highlight on the second page.

3. Attached hereto as **Exhibit 2** and **Exhibit 3** are true and correct copies of documents that were produced by Krause on January 21, 2022. My office added the document labels/numbers for ease of reference.

4. Attached hereto as **Exhibit 4** is a true and correct copy of "Amended Answers of

Defendants, Krause Family Motorcars, LLC to Plaintiffs' First Set of Interrogatories" that was served by Krause on January 21, 2022.

I declare and certify under the penalty of perjury that the foregoing is true and correct.

Executed on January 28, 2022, in Des Moines, Iowa.



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